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September 20, 2017

Ms. Maeve Clancy
U.S. Environmental Protection Agency, Region IX
75 Hawthorne Street, SFD-8-3
San Francisco, California 94105

Subject: Contract No. EP-W-07-066/Task Order No. 066-017-09Q7, George Air Force Base, Review of the Fall 2017 Basewide Groundwater Sampling Event Memorandum, Former George Air Force Base, San Bernardino County, California, August 2017

Dear Ms. Clancy:

Enclosed please find TechLaw's technical review of the Fall 2017 Basewide Groundwater Sampling Event Memorandum, Former George Air Force Base, San Bernardino County, California, dated August 31, 2017 (the Tech Memo).

TechLaw's review revealed that the Tech Memo referenced a Draft Uniform Federal Policy for Quality Assurance Project Plans (UFP-QAPP) from 2012. We commented that the Tech Memo should cite the Final UFP-QAPP, but it is unclear if U.S.EPA has reviewed and approved this UFP-QAPP for use.

This evaluation has been forwarded to you through electronic mail in Word format. TechLaw understands you will review and augment the evaluation at your discretion.

Thank you for the opportunity to provide U.S. EPA with technical oversight services at the Former George AFB. Should you have any questions or comments, please contact me at (510) 290-2044.

Sincerely,

A handwritten signature in cursive script that reads 'Indira Balkissoon'.

Indira Balkissoon
ROC9 Senior Task Order Manager

CG:KB:MP:as

cc: Central Files

FORMER GEORGE AIR FORCE BASE

Victorville, California

**Review of the Fall 2017 Basewide Groundwater Sampling Event Memorandum,
Former George Air Force Base, San Bernardino County, California, August 2017**

Submitted to:

**Ms. Maeve Clancy
EPA TOCOR
U.S. Environmental Protection Agency
Region IX SFD-8-3
75 Hawthorne Street
San Francisco, California 94105**

Submitted by:

**TechLaw, Inc.
235 Montgomery Street
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San Francisco, California 94104**

**Task Order No.
Contract No.
EPA TOCOR
Telephone No.
TechLaw TO Manager
Telephone No.**

**066-17-09Q7
EP-W-07-066
Maeve Clancy
(415) 947-4105
Indira Balkissoon
(510) 290-2044**

September 20, 2017

**Review of the Fall 2017 Basewide Groundwater Sampling Event Memorandum,
Former George Air Force Base, San Bernardino County, California, August 2017**

GENERAL COMMENT

1. The Fall 2017 sampling included a reduced number of wells as compared to the Fall 2016 event as specified by the Fall 2017 Well Variation. The text indicates that the Fall 2016 samples were collected to establish a baseline for analytical results, but should provide rationale explaining why this approach was appropriate when the sampling events for these plumes occur during the spring. Typically, baseline data should be established during the same season as the annual sampling events to account for potential seasonal variation in concentrations of chemicals of concern. The text should also briefly discuss whether there is sufficient data to demonstrate whether seasonal variability occur at each plume. Please revise the Former George AFB – Fall 2017 Basewide Groundwater Sampling Event Memorandum, dated August 2017 (the Tech Memo), to explain why baseline samples were collected in the fall when annual sampling occurs in the spring, and to clarify whether sufficient data are available to evaluate seasonal variability at each well.

SPECIFIC COMMENT

1. **The First Paragraph of the Memo, Page 1, and Conclusion, Page 5:** The Tech Memo references the Draft Uniform Policy Quality Assurance Project Plan (UFP QAPP) (Shaw, 2012a), and does not provide reference to a final version of the UFP-QAPP. Please revise the Tech Memo to reference the Final UFP QAPP.

MINOR COMMENTS

1. **Table 1, Monitoring Well Summary Fall 2017 Basewide Groundwater Monitoring Event, Page 8:** Three proposed sampling locations for the Fall 2017 event are associated with FT019; however, Table 1 does not include a column for FT019 under Associated Sites. To be consistent with the approach for other sites, please revise Table 1 to include a column identifying the proposed sample location for LF019 in Table 1.
2. **Table 1 Monitoring Well Summary Fall 2017 Basewide Groundwater Monitoring Event:** Table 1 does not specify the units used for Proposed Pump Placement. Please revise Table 1 to provide the units used for pump depth.
3. **Table 1 Monitoring Well Summary Fall 2017 Basewide Groundwater Monitoring Event:** Dieldrin is included under the Laboratory Analysis category in Table 1, but none of the samples will be analyzed for dieldrin. Please consider removing the unused Laboratory Analyte Dieldrin column from Table 1.